

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**SARAH E. CLOPTON  
and S.T. STINSON,  
on behalf of themselves and a  
class of persons described herein,**

**Plaintiffs,**

**V.**

**MONSANTO COMPANY;  
PHARMACIA CORPORATION;  
PFIZER, INC.; and SOLUTIA,  
INC.,**

## Defendants.

**CASE NO.: CV-03-C-3369-S**  
**and related cases**

**OPPOSED**

## JURY TRIAL DEMANDED

## **PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

COMES NOW the Plaintiffs, Sarah E. Clopton and S.T. Stinson, by and through counsel, and pursuant to Rule 23(b)(3), move this Honorable Court to certify this proceeding as a class action against Defendants, Monsanto Company, Pharmacia Corporation, Pfizer, Inc., and Solutia, Inc. The substantial grounds upon which this motion is based are set forth in the supporting memorandum and evidentiary materials tendered contemporaneously herewith.

Respectfully submitted,

/s/ Frank Davis  
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One of the Attorneys for Plaintiff

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**CERTIFICATE OF SERVICE**

I do hereby certify that I served a copy of the above and foregoing by electronically filing the same with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following on this the 20th day of June, 2005:

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